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Attorneys for Defendant  
TP-ACO, LLC

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

PARADISE MEDICAL GROUP, INC.,	)	NO. 2:21-CV-00391-KJM-DMC
	)	
Plaintiff,	)	STIPULATION TO CONTINUE HEARING
	)	AND BRIEFING SCHEDULE ON TP-ACO,
vs.	)	LLC'S MOTION FOR STAY; ORDER
	)	THEREON
TP-ACO, LLC,	)	
	)	
Defendant(s).	)	[L.R. 143 and 230(f)]
	)	
	)	Date: June 18, 2021
	)	Time: 10:00 a.m.
	)	Courtroom: 3, 15 <sup>th</sup> Floor

STIPULATION

This stipulation is made and entered into between plaintiff Paradise Medical Group, Inc. ("PMG") and defendant TP-ACO, LLC ("TP-ACO") (collectively, the "Parties"), by and through their respective counsel of record, with reference to the following:

1. **WHEREAS**, TP-ACO filed a motion for a stay of this action set to be heard on June 18, 2021;
2. **WHEREAS**, PMG filed its opposition to TP-ACO's motion for a stay on June 4, 2021;
3. **WHEREAS**, TP-ACO's deadline to file its reply brief in support of the motion to stay is June 11, 2021;

4. **WHEREAS**, the Parties have reached an agreement in principle to settle this action and all issues in dispute between the Parties, subject to that agreement being reduced to writing and duly executed;

5. **WHEREAS**, the Parties are in the process of preparing and finalizing a written settlement agreement; and

6. **WHEREAS**, the Parties desire to avoid unnecessary expenditure of the time and other resources of the Parties and the Court while engaged in the process of entering into a written settlement agreement;

**THEREFORE, IT IS HEREBY STIPULATED**, by and between the Parties, by and through their respective counsel, that:

A. The hearing on TP-ACO's motion for stay should be continued at least 45 days to allow the Parties sufficient time to finalize a written settlement agreement and thereafter submit the appropriate dismissal filings; and

B. TP-ACO's deadline to file any reply papers in support of the motion for stay should be continued to the date seven (7) calendar days prior to the continued hearing on the motion for stay.

Respectfully submitted,

Dated: June 10, 2021

**WEINTRAUB TOBIN CHEDIAK COLEMAN GRODIN**  
Law Corporation

By: /s/ Zachary Smith  
Zachary Smith

Attorneys for Defendant  
TP-ACO, LLC

Dated: June 10, 2021

**OLSHAN FROME WOLOSKY LLP**

By: /s/ Jeremy M. King (as authorized on 6/10/21)  
Jeremy M. King (admitted *pro hac vice*)

Attorneys for Plaintiff  
Paradise Medical Group, Inc.

Dated: June 10, 2021

**HANSON BRIDGETT LLP**

By: /s/ Candice P. Shih (as authorized on 6/10/21)  
Candice P. Shih

Attorneys for Plaintiff  
Paradise Medical Group, Inc.

**ORDER ON STIPULATION**

Based on the Parties' above stipulation and, good cause appearing therefor, **IT IS HEREBY ORDERED:**

1. The hearing on TP-ACO, LLC's motion for stay is continued to August 27, 2021, at 10:00 a.m.; and
2. TP-ACO, LLC's deadline to file any reply papers in support of its motion for stay is continued to seven (7) calendar days prior to the continued hearing on the motion to stay.

**IT IS SO ORDERED**

Dated: June 15, 2021

  
\_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE